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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HERACLIO SANCHEZ-RODRIGUEZ,
a/k/a/ “Charlie” and “Danny Sanchez,”
CHRISTINA REYNA QUINTANA, a/k/a/
“Lete,” TAMARA DENISE BREN, AMY
GARCIA, ERIKA BADILLO, a/k/a/ Erika
Madrigal, and VERONICA SANCHEZ,

Defendants.

No. 3:23-cr-00051-SLG-KFR

COUNT 1:

DRUG CONSPIRACY

Vio. of 21 U.S.C. §§ 846, 841(b)(1)(A)

INDICTMENT

The Grand Jury charges that:

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COUNT 1
DRUG CONSPIRACY

1. Between at an exact date unknown, but by at least on or about February 2022, and continuing through the date of this indictment, within the District of Alaska and elsewhere, the defendants, HERACLIO SANCHEZ-RODRIGUEZ, a/k/a/ “Charlie” and “Danny Sanchez,” CHRISTINA REYNA QUINTANA, a/k/a/ “Lete,” TAMARA DENISE BREN, AMY GARCIA, ERIKA BADILLO, a/k/a/ Erika Madrigal, and VERONICA SANCHEZ, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with others both known and unknown to the Grand Jury, to distribute, and possess with intent to distribute:

- (a) 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4piperidinyl] propenamide—more commonly referred to as Fentanyl;
- (b) 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine; and
- (c) one kilogram or more of a mixture and substance containing a detectable amount of heroin.

METHOD AND MEANS OF THE CONSPIRACY

2. At all times relevant to this indictment, SANCHEZ-RODRIGUEZ was an inmate at the Salinas Valley State Prison, Soledad, California. During the alleged time frame, SANCHEZ-RODRIGUEZ was the leader of the drug trafficking organization (DTO) alleged to have been a part of the conspiracy. Over the course of this conspiracy,

SANCHEZ-RODRIGUEZ repeatedly used multiple contraband cell phones to communicate with his suppliers in Mexico and their brokers, his co-conspirators in California and Oregon, who at his direction obtained, stored, packaged, and shipped the controlled substances to distribute in Alaska and elsewhere, and his co-conspirators in Alaska who received and distributed the controlled substances throughout the state of Alaska per SANCHEZ-RODRIGUEZ's instruction.

3. At all times relevant to this indictment, QUINTANA was an inmate held within the Alaska Department of Corrections, at the Hiland Mountain Correctional Center (HMCC), Eagle River, Alaska. During the alleged time frame, QUINTANA was a high-ranking leader and organizer in the conspiracy who SANCHEZ-RODRIGUEZ called his "wife." QUINTANA recruited soon to be released inmates from HMCC to become members of the DTO and the conspiracy. These new members agreed to receive packages of controlled substances that SANCHEZ-RODRIGUEZ directed be sent to them and to distribute those controlled substances in Alaska.

4. At all times relevant to this indictment, TAMARA DENISE BREN was a resident of Alaska. BREN joined the conspiracy after QUINTANA recruited her. Afterwards BREN quickly rose in the ranks of the conspiracy membership from being a recipient of controlled substance laden packages to becoming a high-ranking member of the conspiracy and someone who SANCHEZ-RODRIGUEZ also called "wife." Not only did she supply others with the conspiracy's controlled substances for distribution, BREN also recruited new members to join the agreement, who then either would receive and distribute controlled substances for the DTO and conspiracy, or who would travel

between Alaska and other states to transport money to pay for controlled substances and/or to transport controlled substances back to Alaska for distribution. BREN also obtained numerous firearms to provide protection for the DTO and conspiracy's operation.

5. At all times relevant to this indictment, AMY GARCIA, ERIKA BADILLO, a/k/a/ Erika Madrigal, and VERONICA SANCHEZ were residents of California. Each are related to SANCHEZ-RODRIGUEZ. GARCIA and BADILLO are his daughters and SANCHEZ is his sister. SANCHEZ-RODRIGUEZ coordinated with his daughters and sister to arrange for the shipment of controlled substances to Alaska via packages sent to Alaska through the United States Postal Service, or via human couriers.

6. During the conspiracy, members would use codenames to refer to one another and to discuss transactions involving narcotics. They also used code words to refer to the controlled substances that the conspiracy distributed: 1) "Blueberries" or "fetty" for Fentanyl; 2) "Agua" for methamphetamine; and 3) "Choco" for heroin. The conspirators acted in concert with one another to promote the distribution and possession with intent to distribute controlled substances and to commit the overt acts of the conspiracy described below.

OVERT ACTS

7. In furtherance of the conspiracy, and to accomplish the objects thereof, the defendants, together with other persons known and unknown to the Grand Jury, performed and caused to be performed certain overt acts in the District of Alaska and elsewhere, including, but not limited to the following:

OA1. Between March 1, 2022, and June 5, 2023, at SANCHEZ-RODRIGUEZ's direction, members of the conspiracy, including but not limited to AMY GARCIA and ERIKA BADILLO, shipped to other members of the conspiracy, including but not limited to BREN, via the United States Postal Service, packages containing controlled substances in the following locations in the District of Alaska:

<u>Date Seized</u>	<u>Sent From</u>	<u>Sent To</u>	<u>Controlled Substance</u>	<u>Apprx. Quantity (grams)</u>
03/21/22	CA	ANCHORAGE	Methamphetamine	1842.72
04/08/22	CA	WASILLA	Methamphetamine	1814.37
04/26/22	CA	FAIRBANKS	Methamphetamine	2324.66
07/17/22	CA	DILLINGHAM	Fentanyl	345.86
07/25/22	CA	PALMER	Fentanyl	595.7
07/25/22	CA	TOGIAK	Fentanyl	257.1
08/08/22	CA	ANCHORAGE	Fentanyl Heroin	1191.8 283.1
08/08/22	CA	ANCHORAGE	Fentanyl	1197.9
08/26/22	CA	KETCHIKAN	Methamphetamine Heroin	444.8 501.4
09/26/22	CA	ANCHORAGE	Heroin Fentanyl	548.62 375.9
09/27/22	CA	ANCHORAGE	Fentanyl Heroin	381.12 549.49
09/30/22	CA	DILLINGHAM	Heroin Fentanyl	535.8 399.8

09/30/22	CA	NEW STUYAHOK	Heroin Fentanyl	539.8 399.4
09/30/22	CA	ANCHORAGE	Heroin Fentanyl	539.3 401.3
09/30/22	CA	ANCHORAGE	Heroin Fentanyl	536.7 389.1
11/02/22	CA	ANCHORAGE	Heroin	754.1
11/04/22	CA	SITKA	Fentanyl	541.51
11/04/22	CA	ANCHORAGE	Fentanyl	555.651
11/25/22	CA	KODIAK	Methamphetamine Fentanyl Cocaine	912.85 555.65 56.7
11/25/22	CA	SITKA	Methamphetamine Cocaine	930 57.5
11/29/22	AK	SITKA	Fentanyl	156.58
12/01/22	CA	KETCHIKAN	Fentanyl	424.3
12/02/22	CA	ANCHORAGE	Methamphetamine	1871.07
12/05/22	CA	SITKA	Fentanyl	540
12/07/22	CA	KETCHIKAN	Methamphetamine	916.7
12/07/22	CA	DILLINGHAM	Fentanyl	544.31
12/08/22	CA	SITKA	Fentanyl	540
12/21/22	CA	TOGIAK	Methamphetamine	912.85
12/21/22	CA	TOGIAK	Fentanyl	544.31
12/21/22	CA	WASILLA	Fentanyl	544.31

12/28/22	CA	SAVOONGA	Fentanyl	323.18
01/05/23	CA	DILLINGHAM	Fentanyl	1888.08
01/23/23	CA	SAVOONGA	Fentanyl	1876.74
02/21/23	OR	ANCHORAGE	Fentanyl	1101.86
02/22/23	OR	PALMER	Fentanyl	549.98
02/22/23	OR	PALMER	Fentanyl	1137.8
02/23/23	OR	ANCHORAGE	Fentanyl	1715.6
03/03/23	OR	ANCHORAGE	Fentanyl	1150.99
03/03/23	OR	ANCHORAGE	Fentanyl	1094.29
03/03/23	OR	ANCHORAGE	Fentanyl	1627.26
03/03/23	OR	ANCHORAGE	Fentanyl	1094.29
03/03/23	OR	ANCHORAGE	Fentanyl	1082.95
03/03/23	OR	ANCHORAGE	Fentanyl	1564.89
03/03/23	OR	ANCHORAGE	Fentanyl	1678.29
03/03/23	OR	SAND POINT	Fentanyl	549.98
03/03/23	OR	DILLINGHAM	Fentanyl	544.31
03/03/23	OR	TYONEK	Fentanyl	1593.24
03/15/23	OR	GOODNEWS BAY	Fentanyl	549.98
03/15/23	OR	GOODNEWS BAY	Fentanyl	555.65
06/05/23	CA	FAIRBANKS	Fentanyl	1144

OA 2. Between June 1 and 5, 2023, SANCHEZ-RODRIGUEZ and BREN recruited and arranged for two couriers to travel between Anchorage, Alaska and California with money to pay for controlled substances that SANCHEZ-RODRIGUEZ had directed be provided to them. Following their arrival in California, GARCIA and

BADILLO provided the two couriers with approximately 2.2 kilograms of fentanyl and 500 grams of heroin to take back with them to Alaska for distribution.

OA3. In September 2022, SANCHEZ-RODRIGUEZ directed members of the conspiracy to mail two packages containing controlled substances be sent to BREN for further distribution. Law enforcement seized the package contents, which included over 500 grams of fentanyl, one kilogram of heroin, and five kilograms of methamphetamine. Additionally, law enforcement seized \$93,000 and four firearms. BREN was subsequently charged with criminal offenses related to those packages. She made bail, cut off her electronic monitoring device, and absconded. On June 6, 2023, law enforcement attempted to arrest BREN on those charges. To avoid arrest, BREN intentionally and repeatedly crashed her vehicle into pursuing law enforcement officer vehicles and caused extensive damage to them. BREN ultimately abandoned her vehicle and fled; she succeeded in avoiding apprehension. Inside her vehicle, BREN left behind approximately one kilogram of fentanyl, as well as multiple loaded firearms and ammunition—loose as well as loaded into magazines. The firearms BREN left behind included five handguns—one of which had previously been reported stolen—and three semi-automatic rifles—one of which had previously been reported stolen, and another that had no serial number. The latter had a barrel measuring 8 inches. Amongst the various forms of ammunition, there were green tipped penetrator rounds loaded into a magazine that fit one of the semi-automatic rifles.

OA4. On or about June 14, 2023, in Pomona, California, under SANCHEZ-RODRIGUEZ's supervision, GARCIA, BADILLO, and VERONICA SANCHEZ had

obtained possession of approximately 900,000 fentanyl pills, 10 kilograms of fentanyl powder, 21 kilograms of methamphetamine, and one kilogram of heroin. On that date, GARCIA and VERONICA SANCHEZ were preparing to deliver some or all of those controlled substances to couriers in Las Vegas, Nevada, who were then expected to deliver those controlled substance to Alaska for further distribution on behalf of the DTO and conspiracy.

All of which is in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Stephan A. Collins
STEPHAN A. COLLINS
Assistant U.S. Attorney
United States of America

s/ Kate Vogel for
S. LANE TUCKER
United States Attorney
United States of America

DATE: June 20, 2023